

EXHIBIT 1

(Exhibit 1)

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

**If you purchased Younique Moodstruck 3D Fiber Lashes
between October 2012 and July 2015 Your Rights May be
Affected By A Class Action Lawsuit**

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- A class action lawsuit involving purchasers of Younique Moodstruck 3D Fiber Lashes in **California, Ohio, and Florida** is currently pending in federal court in Santa Ana, California. The main claim in the case is that Younique told consumers the fiber lashes in the mascara were made of 100% Natural Green Tea Fibers, but in reality the fibers were ground-up nylon. Younique denies any wrongdoing. The Court has not decided who is right.
- On January 10, 2019 the court in this case certified classes of consumers in California, Ohio and Florida who purchased Younique Moodstruck 3D Fiber Lashes between October 2012 and July 2015. Unless you decide to exclude yourself no later than **____, 2019**, your claims will be decided in this case along with other members of the class.
- Your legal rights are affected whether you act, or don't act. **Please read this notice carefully.**

[INSERT PICTURE OF MASCARA]

YOUR LEGAL RIGHTS AND OPTIONS

| | |
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| | |
| Do Nothing | Your legal rights will be determined by the outcome of this case and any judgment in the case will apply to you along with the other members of the class. You may be entitled to any money or other benefits are awarded later from a trial or settlement. But you will never be able to sue the Defendant separately over the claims in this case and you will be bound by any judgment. |
| | |
| EXCLUDE YOURSELF FROM THE CASE BY XXXXX 2019 | The results of the case, whether win, lose or settlement, will not affect you. If any money or benefits are awarded later from a trial or settlement you will not be eligible for them. But you will keep any rights you have to sue the Defendant separately over claims in this case that are not time-barred. |

- These rights and options—and the deadlines to exercise them—are explained in this notice. The deadlines may be moved, canceled, or otherwise modified without additional notice, so please check the court’s docket or the case website [www.court.ca.gov](#).

BASIC INFORMATION

1. Why am I getting this notice?

Records provided by Younique show that you purchased Moodstruck 3D Fiber Lashes between October 2012 and July 2015 and you live or lived in California, Ohio, or Florida when you made your purchase. You have a right to know about this lawsuit because your rights may be affected by its outcome. This notice will give you information about the case so you can decide whether you want to remain part of the case or exclude yourself.

2. What is this lawsuit about?

The lawsuit was brought by several individuals (the “Plaintiffs”) and alleges that Younique, LLC (the “Defendant”) violated certain consumer protection and warranty laws in the labeling, marketing, and advertising of Younique Moodstruck 3D Fiber Lashes sold from October of 2012 to July of 2015.

The lawsuit alleges that Younique stated that the fiber lashes in the mascara were made of “100% Natural Green Tea Leaves” but the fibers were actually ground-up plastic instead. The Plaintiffs are seeking monetary damages.

Younique denies wrongdoing and the court has not decided who is right. The case is proceeding in the United States District Court for the Central District of California (the “Court”), and the case is called *Schmitt v. Younique*, Case No. 8:17-cv-01397. The judge overseeing the case is United States District Judge James V. Selna. A copy of the Plaintiffs’ complaint and Defendant’s answer to the complaint is available at [www.court.ca.gov](#).

3. Why is this a class action?

In a class action, one or more people, called “Class Representatives,” sue on behalf of people who have similar claims. All these people are in a “class” or “class members,” except for those who exclude themselves from the class. The Court determined this case could proceed as a class action on January 10, 2019. A copy of the Court’s order can be found at [www.court.ca.gov](#).

4. How do I know if I am included in the Case?

If you are a consumer in California, Ohio or Florida who purchased Younique Moodstruck 3D Fiber Lashes between October 2012 and July 2015, you are likely included in the Case.

5. Which Products are included in the Case?

The product that is the subject of the case is the Younique Moodstruck 3D Fiber Lashes mascara sold between October 2012 and July 2015. The case does *not* involve the 3D Fiber “Plus” mascara that was sold after July of 2015.

6. What if I am still not sure if I am included in the Case?

If you are not sure whether you are a Class Member, or have any other questions about the case, you should visit the Case Website, www._____.com, or contact the notice administrator by email ([insert email](#)) or the toll-free number, [\[insert toll-free number\]](#)..

STAYING IN THE CASE OR EXCLUDING YOURSELF

If you don't want to be part of the case and you want to keep the right to sue Defendant on your own about the legal issues in this case, then you must take steps to remove yourself from the case. This is called excluding yourself, or it is sometimes referred to as "opting out" of the Class.

7. How do I Exclude Myself from the Case?

To exclude yourself (or "Opt-Out") from the Case, you must complete and mail by U.S. Mail to the Notice Administrator a written request that includes the following:

- Your name and address;
- The name of the case: *Schmitt v. Younique*, Case No. 8:17-cv-01397 (C.D.Cal.);
- A statement that you want to be excluded from the case; and
- Your signature.

You must mail your exclusion request, postmarked no later than [XXXX, 2019](#) to:

[_____](#)

If you don't include the required information or submit your request for exclusion on time, you will remain a Class Member and your claims will be decided in this case.

If you request to exclude yourself, the Court will exclude you from the case.

8. What am I giving up if I do not exclude myself from the Case?

Unless you exclude yourself from the Case, your rights with respect to your purchase of Younique Moodstruck 3D Fiber Lashes between October 2012 and July 2015 will be determined by the outcome in this case. So unless you exclude yourself, you cannot sue the Defendant on your own, or be part of any other lawsuit against the Defendant about the legal issues in this case. It also means that all of the decisions by the Court in this case will be binding on you, win or lose.

THE LAWYERS REPRESENTING YOU

9. Who are the lawyers for the Class in this Case?

The Court has appointed lawyers and firms as "Class Counsel," meaning that they were appointed to represent all Class Members. The firms are The Sultz Law Group P.C., Walsh PLLC, Nye Peabody Stirling Hale & Miller, LLP, and Carlson Lynch Sweet Kilpela & Carpenter, LLP.

These lawyers are working on the case on a contingent basis and you will not be charged. If you want to be represented by your own lawyer, you may hire one at your own expense. You may also enter an appearance in the case through your own attorney if you wish to do so.

IF YOU DO NOTHING

10. What happens if I do nothing at all?

If you do nothing, your claims will be decided along with the claims of the other class members, and you will give up the right to sue Younique based on the issues in this case. Any decisions in the case, win or lose, will be binding on you.

GETTING MORE INFORMATION

11. How do I get more information?

Information about the case as well as updates and documents can be found at www._____.com. If you have additional questions you can email the notice administrator at _____ or call at _____. You may also contact the class counsel listed above.

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE CONCERNING THIS CASE.